

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF GEORGIA**

RUBBEN JACKMAN
Plaintiff,

v.

CREDIT CONTROL, LLC.
Defendant.

) **JURY TRIAL DEMANDED**

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) **Case No.**

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COMPLAINT

INTRODUCTION

1. This is an action for actual and statutory damages brought by Plaintiff Rubben Jackman, an individual consumer, against Defendant, Credit Control, LLC. for violations of the Fair Debt Collection Practices Act, 15 U.S.C § 1692 *et seq.* (hereinafter “FDCPA”), which prohibits debt collectors from engaging in abusive, deceptive, and unfair practices.

JURISDICTION AND VENUE

2. Jurisdiction of this court arises under 15 U.S.C § 1692k(d) and 28 U.S.C 1331. Venue in this District is proper in that the Defendant transacts business in

Decatur, Georgia, and the conduct complained of occurred in Decatur, Georgia.

PARTIES

3. Plaintiff Rubben Jackman (hereinafter “Plaintiff”) is a natural person residing in Decatur, Georgia. Plaintiff is a consumer as defined by the Fair Debt Collection Practices Act, 15 U.S.C. §1692a(3).
4. Upon information and belief, Defendant Credit Control, LLC. is a Missouri corporation.
5. Defendant Credit Control, LLC. is engaged in the collection of debt from consumers using the mail and telephone. Defendant regularly attempts to collect consumers’ debts alleged to be due to another.

FACTS OF THE COMPLAINT

6. Defendant Credit Control, LLC. (hereinafter referred to as “Defendant” or Debt Collector”) is a “debt collector” as defined by the FDCPA, 15 U.S.C 1692a(6).
7. On or about January 18, 2024, Defendant emailed Plaintiff attempting to collect a consumer debt allegedly owed to Truist Bank.
8. On or about January 18, 2024, Plaintiff replied to Defendant’s email stating, “decline to pay.”

9. On or about January 24, 2024, Defendant emailed Plaintiff's again communicating and attempting to collect on the alleged debt. Which was a violation of 15 U.S.C 1692c(c).
10. Plaintiff has suffered actual damages as a result of these illegal collection communications by Defendant in the form of invasion of privacy, intrusion upon seclusion anger, anxiety, decreased productivity at work, frustration, and other negative emotions.

**FIRST CLAIM FOR RELIEF
(Credit Control, LLC.)
15 U.S.C. §1692c(c)**

11. Plaintiff re-alleges and reincorporates all previous paragraphs as if fully set out herein.
12. Debt Collector violated the FDCPA.
13. Debt Collector's violations include, but are not limited to the following:
 - (a) Debt Collector violated 15 U.S.C § 1692c(c) of the FDCPA by communicating with the consumer after the consumer notified Defendant in writing that he refused to pay.
14. As a result of the above violations of the FDCPA, Defendant is liable to Plaintiff for actual damages, statutory damages and costs.

JURY DEMAND AND PRAYER FOR RELIEF

WHEREFORE, Plaintiff respectfully demands a jury trial and requests that judgment be entered in favor of Plaintiff and against the Debt Collector for:

- A. Judgment for the violations occurred for violating the FDCPA;
- B. Actual damages pursuant to 15 U.S.C 1692k(a)(1);
- C. Statutory damages pursuant to 15 U.S.C 1692k(a)(2);
- D. Costs and reasonable attorney's fees pursuant to 15 U.S.C 1692k(a)(3);
- E. For such other and further relief as the Court may deem just and proper.

Respectfully submitted:

By: /s/ Naja I. Hawk
NAJA I. HAWK
Pleadings@thehawklegal.com
THE HAWK LEGAL
COLLECTIVE
730 Peachtree Street NE, #570
Atlanta, GA 30308
Phone: (404) 439-9310
Georgia Bar No. 916396
Counsel for Plaintiff